

EXHIBIT 4

Stephen Stern

From: Stephen Stern
Sent: Friday, October 22, 2021 2:51 PM
To: Bruce L. Marcus
Subject: RE: Daniel White Notice of Deposition

Mr. Marcus:

I am skeptical of Daniel White's back to back trials (without having identified any trial that allegedly conflicted with the first deposition date that was noticed after the court denied his motion to quash). Plus, if the trial next week had been on this calendar for so long, it is unclear why I did not hear about this conflict sooner.

Nevertheless, to move forward with this deposition and get it completed, we can go with November 1 or November 2.

Although the deposition is not proceeding on Monday, there is no reason why Daniel White cannot produce the documents that are responsive to the subpoena. Please have him produce the documents this weekend, as they are long overdue.

Thank you,
Stephen

Stephen B. Stern, Esq.
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-----Original Message-----

From: Bruce L. Marcus <bmarcus@marcusbonsib.com>
Sent: Thursday, October 21, 2021 5:12 PM
To: Stephen Stern <Stern@kaganstern.com>
Subject: Daniel White Notice of Deposition

Dear Mr. Stern,

Please permit me to introduce myself. I have been retained to represent Daniel White in matters related to the Notice of Deposition issued to Mr. White. I tried to reach you by telephone and left a message so please excuse the formality of this correspondence.

Unfortunately, Mr. White is scheduled to be in trial on Monday in the Circuit Court for St. Mary's County in the case of State of Maryland v. Johnson, Case #'s 2018-114; 115 where the lead charge is Attempted Murder and the second charge Carjacking. The trial has been scheduled for some time. In addition, I am scheduled to be out of State next week, but frankly Mr. White's conflict should well explain and justify his inability to appear. I am happy to arrange a time for his deposition convenient to all participants.

Please advise me on the discovery schedule in the case and the dates that may be available to you and other counsel. Thank you in advance for your anticipated courtesy and cooperation in scheduling this deposition.

Sincerely,

Bruce L. Marcus
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Sent from my ipad